

**Statement of Basis  
for Modification of NPDES Permit No. WA0037265**

**Cascade Pole and Lumber Company  
1640 East Marc Street  
PO Box 1496  
Tacoma, WA 98401-1496**

Cascade Pole and Lumber Company is a wood treating facility. The company produces pressure-treated wood products using chromated copper arsenate (CCA, for dimensional lumber), pentachlorophenol (poles), and creosote (poles). The company also purchases railroad ties that it stores on site for re-sale. The company stores treated lumber outside on paved areas.

Stormwater from the site drains to three locations: the Puyallup River, the Lincoln Avenue Ditch, and internally to recycle. The company stores CCA-treated lumber in areas that drain to the Puyallup River, and poles and ties in areas that drain to the Lincoln Avenue Ditch. The company filters stormwater discharges to the Ditch and plans to install filtration for the discharge to the river. Filtration provides treatment for particulate matter and hydrophobic substances, such as pentachlorophenol and poly-aromatic hydrocarbons (in creosote) that bind to particles.

Ecology issued an NPDES permit (No. WA-003795-3) to Cascade Pole and Lumber Company on February 7, 2002. The permit includes effluent limitations and other requirements to protect receiving waters. Under permit conditions S16 and S17, Cascade Pole can either study best management practices (BMPs) and implement those that are cost effective, or the company can implement a set of BMPs that are likely cost-effective based on their use elsewhere or that Ecology expects the study will show to be cost effective. One such measure is isolating dimensional lumber from contact with stormwater; a second is isolating poles and railroad ties from contact with stormwater.

**1. Permit Modification for Treated Dimensional Lumber**

For dimensional lumber, this permit modification requires that Cascade Pole isolate from contact with stormwater all dimensional lumber bundles by September 1, 2002. Presently, material stored on-site prior to May 14, 2002 (60 days from the permit effective date) is not subject to the cover/isolation requirement.

**Special Condition S16 C., 1<sup>st</sup> Bullet**

The item now reads:

- The permittee will completely top and side wrap all treated dimensional lumber bundles with no lumber leaving covered drying or storage areas until it has been so wrapped; or completely cover or otherwise completely isolate from contact from rainfall and stormwater runoff all bundled dimensional lumber.

**Modification (add language to this item):**

*By September 1, 2002, all treated dimensional lumber bundles stored on site will be completely top and side wrapped; or completely covered, or otherwise completely isolated from contact from rainfall and stormwater runoff.*

Ecology is modifying the permit to include this provision to better protect receiving waters. The discharger's representative has indicated that the company does not object to this permit provision.

**2. Permit Modification for Treated Poles and Railroad Ties**

For poles and railroad ties, this permit modification allows Cascade Pole to store poles and ties in the Lincoln Avenue drainage, use its filtration system to treat stormwater discharges, and comply with effluent limits, as an alternative to isolating railroad ties and poles from contact with stormwater. We believe that the two options provide equivalent protection to receiving waters and provide the second option at the request of the discharger.

**Special Condition S16 C., 2<sup>nd</sup> Bullet, now reads:**

The item now reads:

- The permittee will completely cover or otherwise completely isolate from contact from rainfall and stormwater runoff all other treated wood products and newly stored treated wood products. Newly stored refers to treated products that Cascade Pole brings on site for storage and/or re-sale.

**Modification (add language to this item):**

*As an alternative to cover and isolation, Cascade Pole may store these "other wood products" (treated poles and railroad ties) in a location where stormwater drains to recycle or to Outfall 001, provided that if stormwater drains to Outfall 001, Cascade Pole will operate and maintain its mixed media treatment system and meet effluent limits defined in Special Condition 1.*